# The Municipal Drinking Water Licensing Program
# Frequently Asked Questions

| Licence & Drinking Water Works Permit Related Questions | | |
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| 1. | **Q** | I am an owner with multiple drinking water systems. How many licence and drinking water works permit (DWWP) applications do I need to prepare and submit? |
| | **A** | You need to prepare and submit a licence and DWWP application for each system that you own. Each application should consist of the application forms along with any supporting documentation. Please refer to the Schedule A of the 'How To Apply' Guide for more information on what components make up a drinking water system. |
| 2. | **Q** | What format (i.e., hardcopy or electronic) can I use to submit my application(s) to the ministry? |
| | **A** | The following documents/formats are required for the application for a licence, DWWP and submission of operational plan(s):<br>1. **Licence/DWWP/Operational Plan application form** - a hardcopy is required, however, you may also submit an electronic version if you wish<br>2. **Raw Water Assessment** – a hardcopy is required, however, you may also submit an electronic version if you wish<br>3. **Distribution System Description** – a pdf version is required, however, you may also submit a hardcopy if you wish<br>4. **Operational Plan** - hardcopy and pdf versions are required<br>5. **Director's Direction Schedule C** - hardcopy and pdf version are required<br>It is recommended that you copy the electronic versions of your documents to a disk and submit it along with the hardcopies. If you try to submit by email, it may get rejected by your or the ministry's server because of the size of the documents. |
| 3. | **Q** | Do stand alone distribution systems need to include CofAs associated with the independently owned and operated system they receive water from? |
| | **A** | No. You only need to provide the CofA information for the system under your ownership as noted in the application forms. The system you receive water from (separate owner) would be making their own separate application. |
| 4. | **Q** | What types of things are to be included in the "Other Subsystem Component" information part of the application forms? |
| | **A** | Major water-related engineering facilities that fall outside the scope of the Treatment, Pumping and Storage/Reservoir categories on the application form would be captured here. Also, components that would be sufficiently described on a distribution system map (e.g. valve chamber, metering stations) do not need to be included. |
| 5. | **Q** | For a distribution only application where the water is supplied by an independently owned and operated treatment system, will a raw water characterization be required? |
| | **A** | No, you do not need to provide raw water information if you are a **stand-alone** distribution system receiving all of your water from another system or systems. You would therefore leave Box 13 in the Application Forms unchecked as instructed. |

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| 6. | **Q** | What analysis will be required to satisfy the raw water assessment requirements? |
| | **A** | Unless your raw water quality has significantly changed, the Ministry of the Environment (MOE) does not intend for you to supply detailed raw water quality information. In most instances, it is likely that only a summary of the following information is required:<br>- Monitoring results of raw water taken in accordance with regulatory requirements or conditions imposed on a Certificate of Approval.<br>- Monitoring results of raw water taken for purposes of operational control<br>- Results of any raw water assessment which may have occurred in the interim period.<br>Please refer to Schedule B of the 'How to Apply' Guide for more information on what should be provided to support a position that the raw water quality has not changed. |
| 7. | **Q** | What will the time period be for the owner to update the graphical description of the distribution system for incorporation into the DWWP and will there be a condition within the DWWP? |
| | **A** | A condition in the DWWP will require owners to update their watermain descriptions to incorporate replacements, alterations or extensions within 12 months of the work taking place. |
| 8. | **Q** | What do we do if we cannot find a historical certificate of approval (CofA), or are not aware whether a historical CofA even exists? |
| | **A** | It is recognized that some of the CsofA, particularly, older CsofA or when ownership has changed may be difficult to obtain. The 'How to Apply' Guide states … "*The applicant should enter any known Cs of A* …". This is being done to maximize the likelihood of using consistent documentation, mutually understood to be the current legal instrument by both the MOE and the owner, in the preparation of the licence and DWWP. |
| 9. | **Q** | We understand that there is a timeframe of 15 days for an appeal process which appears to be restrictive in a municipal structure; has consideration been given to increasing this timeframe? |
| | **A** | [APPEALS RELATED TO LICENCE AND PERMITS] The 15 day period to appeal one or more conditions imposed on a license and/or DWWP is mandated by the *Safe Drinking Water Act, 2002* (SDWA) and is identical to the current appeal process in place for CsofA. However, the SDWA does allow the Environmental Review Tribunal to extend the time period in which the owner may file an appeal if there is justification to do so. Part 10 of the SDWA contains additional information on appeals. To minimize the need for appeals the ministry will be issuing draft versions of the DWWP and licence, as is currently done with CsofA, to the owner for review and comment prior to the documents being finalized.<br>[APPEALS RELATED TO ACCREDITIATION] The MOE, with input from stakeholders used the same time frame for appeals related to accreditation as is currently in place for CsofA. The MOE, the accreditation body [i.e., the Canadian General Standards Board (CGSB)] and the management committee, will review the appropriateness of this timeframe as the program is rolled out and if necessary, modifications will be made. |
| 10. | **Q** | Will Geographic Information System (GIS) data be acceptable and if not what detail is required for pdf documents? |
| | **A** | Owners and Operating Authorities have told us that their various GIS applications have the ability to "pdf" their documents, which is why we have asked that all distribution system descriptions be submitted in the portable document format (.pdf) to be consistent. If you do not have a GIS application, you could electronically scan a paper document, providing the result is a .pdf file document that contains the information required.<br>Note that you may submit multiple .pdf files providing that all files, when combined, contain the entire watermain distribution system and that document file(s) should have an associated unique file name and a date. |

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| 11. | **Q** | What level of detail is required for the graphical description of the distribution system…..street names and street grids….length of water main etc? |
| | **A** | The graphical description of the distribution system should include watermains that have been constructed and placed into operation as of the date stated but would not include watermains which have been approved but not constructed and placed into operation. The document should identify streets and critical information including, as a minimum; a linear representation of the watermain showing its approximate location within the street, pipe diameter, street name, valving and hydrant locations. |
| 12. | **Q** | Will the Municipal Drinking Water Licensing Program be acknowledging the Transfer of Review process? |
| | **A** | The Transfer of Review Program will be phased out for water systems as the Licensing Program is phased in. Under the Licensing Program, Owners will now have the authority to move forward on future alterations, without having to apply to the minister, to water systems that meet outlined design criteria. These design criteria and the requisite terms and conditions for these future alterations will be identified in the first DWWP issued to the owner.<br><br>If your proposal does not meet all of the pre-requisite terms and conditions for these future alterations, you must apply to the ministry for an amendment to your DWWP.<br><br>Note that the Transfer of Review process for sewage works will continue. |
| 13. | **Q** | Can you please elaborate on when we will be required to prepare and submit financial plans as part of the licensing program? |
| | **A** | For existing municipal residential drinking water systems, the licence will contain a condition on the preparation and approval of financial plans. This condition will state that the owner of the drinking water system must prepare and approve their financial plan by either July 1, 2010 or six months after the date the licence, which ever is later. For example:<br>▪ if an owner receives their licence on June 15, 2009, then they would need to prepare and approve their financial plan by July 1, 2010<br>▪ if an owner receives their licence on June 15, 2010, then they would need to prepare and approve their financial plan by December 14, 2010<br><br>You are required to submit a copy of your financial plan to the Ministry of Municipal Affairs and Housing. You are NOT required to submit a copy of your financial plan to the MOE, however, we will be asking you to submit a copy of your resolution when you renew the licence. |

| Accreditation & Operational Plan Related Questions | | |
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| 14. | **Q** | The submission of our Operational Plan (OP) to the MOE seems somewhat premature, as we will submit the same version for accreditation. During the accreditation process we may be required to make changes to our OP. Is there any benefit in submitting to both parties, or could the MOE simply receive the OP once it has been accredited? This reduces the chance of outdated versions floating around. |
| | **A** | We recognize that the OP submitted on the regulated date may be different from the OP that is accredited by CGSB. However you will not be required to re-submit this modified OP to the MOE. The MOE and CGSB will have an internal process in place to ensure that the ministry has a copy of the plan used for accreditation. |
| 15. | **Q** | We have multiple drinking water systems and most of our OP is generic (i.e., procedures are the same for all systems). Is it possible for us to submit one OP with appendices (or sections) where procedures are system specific or do we need to prepare completely separate plans for each system? |
| | **A** | As long as the requirements of the Drinking Water Quality Management Standard (DWQMS) and Director's Directions are met, for operating authorities overseeing multiple drinking water systems within a municipality (i.e. the same owner), the MOE and CGSB will accept the submission of a single OP. However, the OP must clearly indicate which parts of the plan pertain to each system.<br><br>*EXAMPLE: An operating authority operates three drinking water systems. While preparing the OP for the systems they determine that with the exception of Elements 6, 7 and 8 all of the requirements pertaining to the other elements in the DWQMS are common to the three systems. They then decide to prepare one common plan, with the requirements for Elements 6, 7, and 8 for each system noted in separate appendices.* |
| 16. | **Q** | When submitting our OP, do we submit just the OP itself, or do we need to also include all supporting documentation (documents/procedures that are referenced in the plan, for example our Emergency Response Plan)? |
| | **A** | For the documentation review portion of the audit (the systems audit), the CGSB will require the OP and related policies and procedures that identifies the processes used to meet the requirements of the DWQMS. The CGSB does reserve the right to request additional documentation (e.g. standard operating procedures) as necessary. Again it is important to remember that Operating Authorities must submit appropriate documentation that enables the CGSB to determine if they are meeting the relevant PLAN Elements of the DWQMS. |
| 17. | **Q** | What are the application submission options for operating authorities overseeing more that one drinking water system? |
| | **A** | For operating authorities responsible for more than one system within a municipality (i.e. for the same owner), they may submit one application provided that:<br><br>- the same accreditation option (full scope – entire DWQMS, limited scope – partial DWQMS etc) is chosen for all of the systems in the application.<br><br>*EXAMPLE:*<br><br>*An operating authority oversees 11 drinking water systems for the same owner. They wish to apply for the Limited Scope – Entire DWQMS option for all 11 systems. Using Form AP602: Applicant Profile in the Accreditation Handbook, the operating authority needs to prepare and submit only one copy of page one of the form (applicant and accreditation information) and prepare and submit a copy of page two of the form (QMS and Subject System Information) for each of the 11 systems.* |

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| 18. | **Q** | What would the accreditation application fees be for operating authorities responsible for multiple drinking water systems? |
| | **A** | Application fees (which are initial one-time, non-refundable administration fees charged by CGSB for operating authorities to receive their initial accreditation) are dependant on the number of systems that the operating authority is responsible for and needs accreditation to operate. It also depends on if the systems have the same owner and are choosing the same accreditation option. The Accreditation Handbook has more information about fees.<br><br>*EXAMPLE 1:*<br><br>*An operating authority oversees 11 drinking water systems. All 11 systems are owned by the same owner. The operating authority has chosen to apply for the same accreditation option for all of the systems. Therefore, the operating authority can submit one application for all 11 systems. The fee associated with the application is $500 for the first system, $150 for each additional system for a total application fee of $2,000 (plus GST).*<br><br>*EXAMPLE 2:*<br><br>*An operating authority oversees two drinking water systems. Although the two systems are owned by the same owner, the operating authority is choosing to apply for a different accreditation option for each system. The operating authority must submit two separate applications. The fees associated with each application is $500 for each for a total of $1,000 (plus GST) to be paid to the accreditation body.*<br><br>Please note that the format of the OP(s) submitted will not impact the amount of application fees. So, in Example 1 above the application fee would be the same if they submitted one master OP with appendices or 11 separate plans. However, the time needed to conduct a systems audit will vary greatly depending on the format of the OP(s) submitted (i.e. more time will be needed to audit multiple Operational Plans than to audit one master OP). Since the systems audits (documentation review) are billed at an hourly rate, the cost for conducting them on multiple separate OPs will thus be greater than the cost to audit a single master OP. |
| 19. | **Q** | Do we have to have hard copies of OPs at each drinking water system or is electronic access sufficient? If hard copy is required, does one need to be at each location within that system or just accessible (for example - we could have a few different sites in one drinking water system) |
| | **A** | There is no requirement to have the OP in either hard or electronic copy, however, element 5 of the DWQMS, requires you to have a procedure for document and records control which includes ensuring the OP is retrievable and kept current. Chapter 9, Documents and Records Control, of the Implementation Guide provides detailed guidance on this (www.ontario.ca/drinkingwater). |
| 20. | **Q** | Do both the MOE and the CGSB want electronic and hard copies of OP? |
| | **A** | Submission of only an electronic copy of the OP will be sufficient for CGSB.<br><br>The MOE requires that both a hard copy and electronic copy be submitted according the Director's Directions. For owners of multiple systems covered under one plan, you can submit only one hard copy of the plan with the licence and DWWP application for one of your systems. The licence and DWWP applications for the other systems should note on the form which application has the OP included.<br><br>*EXAMPLE:*<br><br>*An owner has three systems: X, Y and Z and one OP that covers all of them. They decide to submit the hard and electronic copy of the OP with the application for "System X". They then note this in the licence and DWWP application forms for systems Y and Z (in the additional information box).* |

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| 21. | **Q** | Will the accreditation body be taking a sample of locations within each drinking water system (similar to ISO 14001 or 9001 audits) or visiting every single location? |
| | **A** | CGSB will visit every single location of a drinking water system during the initial on site verification audit, to ensure that the appropriate elements of the DWQMS are being met throughout the system. For subsequent reaccreditation on site audits, CGSB may take a sample of locations within each drinking water system to ensure ongoing conformity of the system to the elements of the Standard. |
| 22. | **Q** | How soon will we hear after submitting our OPs when we can expect to be audited? Will there be some flexibility regarding the scheduling to accommodate other operational issues and/or existing commitments? |
| | **A** | You can expect an on-site verification audit 8-12 weeks after CGSB has received your application package (including OP). CGSB will allow sufficient flexibility during audit planning to accommodate participant schedules and existing commitments; in particular, CGSB will ensure that your on-site verification audit does not occur during your yearly inspection. |
| 23. | **Q** | Can you tell me how much lead time we might get in scheduling the audits with CGSB? |
| | **A** | CGSB anticipates the on-site audit will occur 8-12 weeks after your accreditation application is received. The systems audit will likely take place in the first 4 weeks after you submit your application. CGSB will schedule the on-site audit with you following the systems audit, and will allow 4-8 weeks leeway to provide operating authorities with time to respond to any corrective action requests, and to ensure all required participants are available for the on-site audit. |
| 24. | **Q** | What changes to an Operational Plan would be considered significant enough to require a re-application? |
| | **A** | Changes to an Operational Plan may require a document review/systems audit and subsequent on-site verification audit, but not a re-application. Once an operating authority has applied for accreditation, they need not re-apply, unless their accreditation has been revoked or they are applying for a new system.<br><br>That said, the operating authority must notify CGSB of any changes to the Operational Plan that they believe may be significant enough to risk non-conformity to the Standard. |
| 25. | **Q** | What exactly is the auditor looking for in the Evaluation Checklist Form that we are to fill out? Or is the auditor going to complete this form? |
| | **A** | Operating authorities are asked to identify, in the Comment section, the necessary components of their Operational Plan (e.g. section #, page #, procedure #) that meet the relevant PLAN element of the Standard. This exercise will greatly assist the auditor in locating the relevant passages of the Operational Plan during the systems audit, thus cutting down on the time required to complete the audit (and thus the cost).<br><br>Please note that the operating authority may use an alternate mapping document, provided it clearly shows which components of their Operational Plan meet the relevant PLAN elements of the Standard.<br><br>There is no need for the operating authority to complete the Comment column for the DO elements of the Standard; this column is reserved for the auditor's use during the on-site verification audit (if applicable). |

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| 26. | **Q** | What formats are acceptable to CGSB when submitting the application forms? Page 27 of the handbook states the preferred method is by email. However, AP-608 (Rev 2) states the checklist should be submitted in both hard and electronic copy and AP-602 (Rev 1) states that it should be faxed in to expedite a response. |
| | **A** | The preferred method is email, as it is received quickly. AP-608 will be corrected in a future version to read "It is preferred that the checklist be submitted in electronic form."AP-602 states faxing as a preferred method, since this document must be signed; however, it may also be scanned and sent by email. |
| 27. | **Q** | What is the overall cost for listing fees and when are they due? |
| | **A** | Annual listing fees are $250 per drinking water system and will be billed to operating authorities following accreditation, and every year thereafter. Listing fees are not to be included with the initial application; only the application fees are due with the application. |
| 28. | **Q** | During an on-site audit, will the auditor be visiting every part of my system (e.g., every pumphouse)? |
| | **A** | If a pumphouse has no personnel on-site, it will be left to the discretion of the auditor to visit it or not. If personnel are present, the auditor will visit the pumphouse to ask questions on duties performed/records as per procedure and competencies as per job description and duties. |
| 29. | **Q** | Do I have to resolve all my non-conformances for the internal audit to be considered completed? |
| | **A** | The Accreditation Handbook does not specify a requirement for the internal audit to be completed. The internal audit (i.e. the audit itself) must be conducted and documented before CGSB will proceed with an on-site verification audit during initial accreditation. Prior to the subsequent surveillance audits, CGSB will request the results of any internal audits (e.g. internal audit report and any non-conformances).<br><br>Some non-conformances may require a lengthy timeframe to resolve. A non-conformance has been addressed if an appropriate action plan for resolution has been identified and documented. A non-conformance has been resolved if the appropriate action plan was appropriately implemented. |